



April 17, 2009

Mary Nichols, Chairwoman
California Air Resources Board
1001 "T" Street
Sacramento, CA 95814

Dear Chairwoman Nichols and members of the board:

On behalf of more than 6,000 members of the Iowa Corn Growers Association, we thank the California Air Resources Board (CARB) for the opportunity to comment on the proposed regulation to implement the Low Carbon Fuel Standard (LCFS). We have concerns about the impact this regulation will have on the ability of biofuels such as ethanol to reduce the carbon footprint of California and the nation.

First and foremost, we urge you to defer the incorporation of indirect land use changes in this regulation until indirect land use can be determined for all fuels and energy sectors and to allow for additional research to be performed by experts in the field. This regulation applies indirect land use change to biofuels but not to other fuels, distorting fuel comparisons. The negative impact of this regulation on corn ethanol could result in an increase, rather than a decrease, in California's green house gas emissions. Further study and peer-reviewed research is needed before the LCFS is put in place.

In addition, the topics listed below are other key points under the regulation that require further review to provide the most accurate and updated fuel comparisons to Californians:

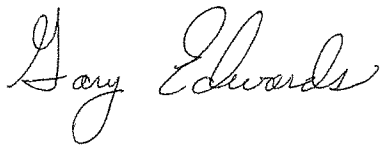
- A recently released peer-reviewed publication in the *Journal of Industrial Ecology* titled Improvements in Life Cycle Energy Efficiency and Greenhouse Gas Emissions of Corn-Ethanol has shown that corn-based ethanol reduces direct greenhouse gas emissions by 48 to 59 percent as compared to gasoline. The LCFS look-up tables do not reflect this information.
- CARB identifies a large discrepancy in carbon intensity values for California dry mill wet distillers grains with solubles in comparison to Midwest dry mill wet distillers grains with solubles; however, data to support this claim have not been fully disclosed and deserve further review.
- An accurate and updated portrayal of modern agricultural practices and efficiencies related to inputs and production yield is lacking. According to industry experts, average yields are increasing at a faster pace than previous trend

lines, and farmers have made significant improvements in fertilizer use efficiency during the past thirty years.

- In September 2008, Dr. Michael Wang at the Argonne National Laboratories released a report on feeding and displacement ratios for distillers grains. This report indicates that for each pound of distillers grains that included in a ration, 1.28 pounds of conventional corn and soy-based feed is replaced. This updated research differs from the ratio used as a basis by CARB and should be incorporated into the regulation.

Thank you for consideration of these comments on behalf of the Iowa Corn Growers Association. Please feel free to contact the Iowa Corn office at the number below for more information.

Sincerely,

A handwritten signature in cursive script that reads "Gary Edwards". The signature is written in dark ink and is positioned above the printed name and title.

Gary Edwards, President
Iowa Corn Growers Association